

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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STATE OF NEW YORK, et al.,

*Plaintiffs*, :

v.

UNITED STATES DEPARTMENT OF COMMERCE, et al., :

*Defendants.* 18-CV-2921 (JMF)

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NEW YORK IMMIGRATION COALITION, et al.,

*Plaintiffs,*

v.

UNITED STATES DEPARTMENT OF COMMERCE, et al.,

*Defendants.*

USDC SDNY
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18-CV-5025 (JMF)

: (Consolidated)

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**PLAINTIFF – INTERVENOR ROBERT A. HEGHMANN’S MEMORANDUM OF LAW**

**IN SUPPORT OF HIS MOTION TO INTERVENE**

Plaintiff Intervenor Robert A. Hegmann respectfully submits this Memorandum of Law in support of his Motion to Intervene in this action filed by the State of New York and others against the Department of Commerce. The Plaintiff - Intervenor moves pursuant to Federal Rule of Civil Procedure 24 to intervene as of right.

*Statement of Facts*

As set forth in the Intervenor-Plaintiff’s Motion to Intervene, the real parties in interest here are Suburban and Rural Citizen Voters. The Democrats under President Barack Obama

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